



**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**EB-06-TC-060  
Certification of CPNI Filing  
February 6, 2006**

My name is Richard L. Allen, and I am the Vice - President of Pathway Com-Tel, Inc. ("Company") of P.O. Box 1298, Joshua, TX 76058. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("FCC") customer proprietary network information ("CPNI") rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations, Sections 64.2001 through 64.2009.

This certification is made pursuant to the requirements of the Federal Communications Commission ("FCC") under Section 64.2009(e) of the FCC rules. The purpose of this certification is to verify this company's compliance with FCC requirements regarding the company's maintenance, use, and protection of customer proprietary network information ("CPNI").

<u>/s/ Richard L. Allen</u>	<u>Vice-President</u>
Signature	Title
<u>Richard L. Allen</u>	<u>Pathway Com-Tel, Inc.</u>
Printed Name	Company

Date February 2, 2006

cc. Byron McCoy, via e-mail- [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)

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STATEMENT OF COMPLIANCE WITH THE FCC'S  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

To the best of my knowledge, Pathway Com-Tel, Inc. (the Company) is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company has designed and implemented a system to ensure the protection of our subscribers' CPNI as follows:

- a. The Company already is in compliance with the more restrictive guidelines required under Texas law and mandated by the Public Utility Commission of Texas in its Substantive Rules Sections 26.122 and 26.133.
- b. Under Texas PUC Substantive Rules, the Company is required to provide annual notice to its subscribers of the Company's CPNI compliance and inform such subscribers how they may require restrictions on release of such information. By FCC and Texas rules, the Company is required to record any marketing uses of CPNI.
- c. As a part of compliance with Texas law on CPNI both management and and/or key employees underwent workshop training (required by the Texas Legislature, and PUC rules and sponsored by Texas Statewide Telephone Cooperative, Inc.) on competitive "Code of Conduct" procedures that included CPNI rules for the protection of customers' privacy.
- d. The Company routinely instructs its employees, who have access to CPNI, regarding the restrictions of state and federal law for customer protection. Any employee that discloses CPNI in violation of FCC and Texas PUC rules is subject to disciplinary action and possible termination.

**Company CPNI status:** To the best of my knowledge and belief, the Company does not presently sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is used by the Company for its sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.